

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

KARLA PEREZ, *et al.*,

Defendant-Intervenors,

and

STATE OF NEW JERSEY,

Defendant-Intervenor.

Case No. 18-cv-00068

FEDERAL DEFENDANTS' RULE 26(a)(1) INITIAL DISCLOSURES

TO: Plaintiffs, c/o Todd L. Disher, Special Counsel for Civil Litigation, Texas Attorney General's Office, P.O. Box 12548, Austin, TX 78711-2548, todd.disher@oag.texas.gov;

Defendant-Intervenors Karla Perez, et al., by and through their attorney of record, Nina Perales, Mexican American Legal Defense and Educational Fund, 110 Broadway, Suite 300, San Antonio, Texas 78205; and

Defendant-Intervenor the State of New Jersey, by and through its attorney of record, Glenn Moramarco, New Jersey Attorney General's Office, Division of Law, Richard J. Hughes Justice Complex, 25 Market Street, 8th Floor, Trenton, New Jersey 08625-0116, glenn.moramarco@law.njoag.gov.

Federal Defendants provide the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Federal Defendants provide these disclosures subject to their general objection to any discovery taking place in this litigation, as it is a matter subject to review of an administrative record. *See* Fed. R. Civ. P. 26(a)(1)(B)(i). These disclosures are based on information reasonably available to Federal Defendants at the current time. Federal

Defendants reserve their rights to supplement these disclosures pursuant to Federal Rule of Civil Procedure 26(e).

1. Rule 26(a)(1)(A)(i):

The following individuals are likely to have discoverable information that Federal Defendants may use to support their defenses, unless solely for impeachment. Defendants will supplement these disclosures as appropriate.

- a. All individuals identified in Plaintiffs' and Defendant Intervenors' initial disclosures.
- b. Any individuals revealed and/or yet to be revealed in discovery.

2. Rule 26(a)(1)(A)(ii):

The following documents, electronically stored information, and tangible things in Defendants' possession, custody, or control may be used to support their defenses, unless solely for impeachment.

- a. Documents included in the administrative record regarding the creation of DACA.
- b. Documents that are publicly available on DHS, USCIS, ICE and/or CBP websites.
- c. Correspondence with, testimony before, and responses to any questions for the record from Congress regarding DACA
- d. Documents identified, produced, or filed in court by Plaintiffs or Defendant Intervenors.

3. Rule 26(a)(1)(A)(iii):

Defendants have no claimed damages.

4. Rule 26(a)(1)(A)(iv):

Not applicable.

Dated: December 17, 2018

JOSEPH H. HUNT
Assistant Attorney General
Civil Division

BRETT A. SHUMATE
Deputy Assistant Attorney General

WILLIAM C. PEACHEY
Director, Office of Immigration Litigation
District Court Section

Attorneys for Federal Defendants

Respectfully submitted,

/s/ Jeffrey S. Robins

JEFFREY S. ROBINS
Attorney-in-Charge
Deputy Director
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Washington, DC 20044
Telephone: (202) 616-1246
Facsimile: (202) 305-7000
jeffrey.robins@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2018, the foregoing document is being served on all counsel of record by electronic mail.

/s/ Jeffrey S. Robins

JEFFREY S. ROBINS

Attorney-in-Charge

Deputy Director

Attorneys for Federal Defendants